

THE LAW OFFICE OF NICK ROSENTHAL, APC

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Attorneys for Plaintiff,
JOVAN NEWLAND, individually,
and on behalf of all others
similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

JOVAN NEWLAND, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

WJD RESTAURANT GROUP, LLC, a
California Limited Liability Company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 24STCV10446

[Unlimited Jurisdiction]

*Assigned to the Honorable Laura A.
Seigle, Dept. 17*

**PLAINTIFF'S DECLARATION IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL**

Complaint Filed: April 25, 2024

Trial Date: Not set.

DECLARATION OF JOVAN NEWLAND

I, Jovan Newland, declare as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-reference action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I have been employed by Defendant WJD Restaurant Group, LLC (“Defendant”) as a server since approximately November of 2021. I work as an hourly, non-exempt employee.

3. I believe that Defendant often collected “service appreciation fees” from customers. These “service appreciation fees” were not mandatory and were above and beyond the mandatory “service charge” implemented by Defendant. In other words, the “service appreciation fees” were gratuities. However, I rarely received any portion of such gratuities.

4. I understand that this action was brought on behalf of all other employees in the State of California, and that I am acting as a representative for the Class. As a Class Representative, I understand that it is my responsibility to act in the best interests of the Class and not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any conflicts that exist between my interests and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

5. I have and continue to be willing to assist in the investigation of this matter, including meeting and discussing the case with my attorneys, providing any necessary information and documents, making myself available for trial or any further proceedings in this matter as required to represent the interests of the Class. I also understand my duties and responsibilities to the proposed Class and will carry out those duties as necessary.

6. I have reviewed the Class Action and PAGA Settlement Agreement (“Settlement Agreement”) and discussed its terms with my attorneys. Based on the information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the entire Class.

7. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people will benefit because of the actions that I have taken.

8. I have been advised in writing that The Kick Law Firm, APC will receive 60

1 percent of any attorneys' fees collected and The Law Office of Nick Rosenthal, APC will
2 receive the remaining 40 percent of the attorneys' fees. I have provided my written approval of
3 this fee split.

4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct.

6 Executed on 2/9/2026 at Los Angeles, California.

Signed by:

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Jovan Newland